



*From the desk of:
James M. Kramer, Esq.*

October 12, 2021

VIA ECF

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

The proposed modified schedule is adopted.
SO ORDERED

DEBRA FREEMAN
United States Magistrate Judge

Dated: 10/13/2021

Re: *Gref v. Am. Int'l Indus., et al., 20-cv-05589*

Dear Judge Freeman,

Plaintiff in the above-captioned case writes to apprise the Court of the parties' progress in negotiating a mutually agreeable discovery schedule. Pursuant to the Court's directive at our most recent conference, the parties have reached an agreement that discovery should proceed according to the following modified schedule:

- All fact discovery must be completed by November 30, 2021;
- Plaintiff's medical expert reports must be served upon Defendants by December 15, 2021;
- Plaintiff's non-expert reports must be served upon Defendants by January 15, 2022;
- Defendants' medical expert reports must be served upon Plaintiff by January 15, 2022;
- Defendants' non-expert reports must be served upon Plaintiff by February 15, 2022;
- Any rebuttal reports must be served by March 15, 2022;
- Expert depositions must be completed by April 29, 2022; and
- All discovery must be completed by May 13, 2022.

Plaintiff and the remaining Defendants request that the Case Management Order and Scheduling Order be amended to reflect the aforementioned schedule. Plaintiff's counsel stands ready should the Court have any questions.

Respectfully Submitted,

We stand for our clients.

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cc: All Counsel of Record (via ECF and electronic mail)

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